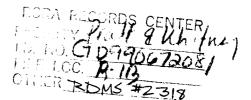


November 30, 1990

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Mr. George Dews
Senior Sanitary Engineer
Waste Management Bureau
Department of Environmental Protection
165 Capitol Avenue
Hartford, CT 06106

Mr. Stephen Yee Environmental Engineer Waste Management Division US EPA 90 Canal Street - 3rd Floor Boston, MA 02114



Re:

Extension Request for the Burn-Zol Hazardous Waste Incinerator

Closure

UTC - Pratt & Whitney, East Hartford, CT

EPA ID # CTD 990672081

Ref:

Interim Report - Closure of the Burn-Zol Incinerator submitted

June 13, 1990

Dear Sirs:

This letter has been prepared as a request for extension to the closure time period for the Burn-Zol Hazardous Waste Incinerator. Presented below is a brief summary of closure activities performed since the submittal of the Interim Report (6/13/90) and additional information supporting Pratt & Whitney's (P&W) extension request.

As summarized in the above referenced document, closure of the subject unit is considered complete with exception of two waste feed lines which did not meet the closure criteria for selected volatile organic constituents. Subsequently, in July 1990, a third round of waste feed line decontamination and sampling was performed consistent with the general methods outlined in the approved closure plan.

Sampling data for the two waste feed lines continues to show marked decreases in volatile organic constituent concentrations. Unfortunately, two constituents, trichloroethene and tetrachloroethylene remain above the closure criteria levels. These results have prompted P&W to investigate waste feed line removal and disposal as an alternative closure method to decontamination.

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As shown in Appendix A, Figure 3 of the Interim Report, the waste feed lines originate in the basement of P&W's Barrel Storage Building. Although not shown on Figure 3, these lines share a common pipe trench with numerous other utilities serving P&W's Concentrated Waste Treatment Plant (CWTP). These utilities are currently being upgraded in two phases. Phase I consists of installing a new utility trench and work began in October 1990. Once the new utility trench is operational, the existing utility trench will be decommissioned and removed (Phase II). Phase II is scheduled for completion by August 1991.

Since the waste feed lines share the existing utility trench it is desirable to integrate the remaining closure activities with Phase II of the utility upgrade program. This approach is the most efficient use of available resources and will minimize the impact to the ongoing hazardous waste storage and handling activities at the CWTP.

We respectfully request an extension to the closure period until September 11, 1991. This extension should provide adequate time to remove the two waste feed lines and arrange for final transportation and disposal at a secure RCRA permitted landfill.

Your time in review of this request is greatly appreciated and we are hopeful it will meet with agency approval. P&W is intent on pursuing clean closure of the subject unit in the near future. The extension will allow P&W to execute the remaining closure activities in the most efficient way possible.

Should you have any questions or comments regarding this request please contact Mr. Scott Singer at (203) 565-3514.

Sincerely,

Ŕ. C. Weiss

Director, Facilities & Services

RCW/SLS/dag

scott